

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division**

WALTER SCOTT LAMB,	)	
Plaintiff/Counterclaim Defendant,	)	Case No. 6:21-cv-00055
v.	)	Hon. Norman K. Moon
	)	
LIBERTY UNIVERSITY, INC.,	)	
a Virginia corporation,	)	
Defendant/Counterclaim Plaintiff.	)	

**LAMB’S MOTION TO COMPEL PRODUCTION  
CONCERNING CONVOCATION SPEECH MATERIALS**

Comes now Walter Scott Lamb, by counsel, pursuant to Federal Rule of Civil Procedure 37, and files motion to compel responses and overrule privilege objections pertaining to Lamb’s Requests for Production 14 (ECF Doc. 96-1), concerning convocation speech materials.

For the reasons stated in the accompanying brief, Lamb respectfully requests the Court to overrule these objections and require Liberty to produce the materials requested in Lamb’s Requests for Production 14, and all such further relief as may be appropriate, including attorney fees pursuant to Federal Rule of Civil Procedure 37.

The undersigned counsel certifies that counsel has attempted to confer to resolve this dispute without court action.

Respectfully submitted,  
WALTER SCOTT LAMB

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of July, 2022, I presented the foregoing document(s) to the Clerk of the Court for filing and uploading to the CM/ECF system, which will provide electronic notice and copies of such filing(s) to counsel of record.

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